

**WILLKIE FARR & GALLAGHER LLP**

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153)

aflorez@willkie.com

Attorneys for  
GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and  
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF STEVE GANEM IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
RE: PLAINTIFFS' REPLY IN SUPPORT OF  
MOTION FOR RELIEF FROM CASE  
MANAGEMENT SCHEDULE**

*[Declaration of Eduardo E. Santacana in Support  
of Administrative Motion to Seal filed  
concurrently herewith]*

Judge: Hon. Alex G. Tse  
Courtroom: A – 15th Floor  
Trial Date: Not Yet Set

1 I, STEVE GANEM, declare:

2 1. I am a Group Product Manager at Google LLC (“Google”) with supervisory  
3 authority concerning Google Analytics for Firebase (“GA for Firebase”). In my role as Group  
4 Product Manager, I am familiar with Google’s practices regarding the treatment of sensitive  
5 business and technical information.

6 2. Unless otherwise stated, the facts I set forth in this declaration are based on my  
7 personal knowledge or knowledge I obtained through my review of corporate records or other  
8 investigation. If called to testify as a witness, I could and would testify competently to such facts  
9 under oath.

10 3. I submit this declaration in support of the Administrative Motion to Consider  
11 Whether Another Party’s Material Should be Sealed filed by Plaintiffs. ECF No. 179. I have  
12 reviewed Exhibit D to Plaintiffs’ Reply in Support of Motion for Relief from Case Management  
13 Schedule, which has been designated for sealing. ECF No. 179-4.

14 4. **Exhibit D** contains a discussion between several Google product managers and  
15 other employees, which discloses confidential and proprietary information concerning the  
16 technical underpinnings of Google’s settings. The email thread also discloses Google’s product  
17 design and strategy, including consideration of specific risks. Google considers this information  
18 proprietary, and it is kept confidential both internally at Google and in litigation, and it should be  
19 shielded from unnecessary public disclosure.  
20

21 I declare under penalty of perjury under the laws of the United States of America that the  
22 foregoing is true and correct.  
23

24 Executed November 29, 2021, at San Francisco, California.

25  
26  
27 /s/ Steve Ganem  
STEVE GANEM